

JASON M. FRIERSON  
United States Attorney  
Nevada Bar No. 7709  
BIANCA R. PUCCI  
Assistant United States Attorney  
Nevada Bar No. 16129  
501 Las Vegas Blvd. South, Suite 1100  
Las Vegas, Nevada 89101  
(702) 388-6336  
[Bianca.Pucci@usdoj.gov](mailto:Bianca.Pucci@usdoj.gov)  
*Attorneys for the United States of America*

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,

Plaintiff,

v.

TOMMY GHOLSON,

Defendant.

Case No. 2:21-cr-00113-APG-EJY

**Stipulation to Continue Sentencing  
Hearing**

**(Third Request)**

IT IS HEREBY STIPULATED AND AGREED, by and between Jason M. Frierson, United States Attorney, and Bianca R. Pucci, Assistant United States Attorney, counsel for the United States of America, and Rene L. Valladares, Federal Public Defender, and Benjamin F. Nemec, Assistant Federal Public Defender, counsel for Tommy Gholson, that the Sentencing Hearing currently scheduled on Tuesday, March 7, 2023, at 1:30 p.m., be vacated and continued to a time convenient to the Court but no sooner than 7 days. This Stipulation is entered into for the following reasons:

1. The government attorney will be out of the district for the current scheduled sentencing date and time.

2. The Defendant is out of custody and does not object to the continuance.

1           3.     The parties agree to the continuance.

2           4.     Under Rule 32(b) of the Federal Rules of Criminal Procedure, the district court  
3 must impose sentence without unnecessary delay. The government's request to continue  
4 sentencing is necessary for the government to adequately prepare and be present at the  
5 defendant's sentencing hearing.

6           5.     This is the third request for continuance filed herein.

7  
8           DATED this 21st day of February, 2023.

9  
10          JASON M. FRIERSON  
11          United States Attorney

10          RENE L. VALLADARES  
11          Federal Public Defender

12          /s/ Bianca R. Pucci  
13          BIANCA R. PUCCI  
14          Assistant United States Attorney

12          /s/ Benjamin F. Nemec  
13          BENJAMIN F. NEMEC  
14          Assistant Federal Public Defender  
15          Attorney for Defendant Tommy Gholson  
16  
17  
18  
19  
20  
21  
22  
23  
24

UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

UNITED STATES OF AMERICA,

Plaintiff,

v.

TOMMY GHOLSON,

Defendant.

Case No. 2:21-cr-00113-APG-EJY

**ORDER**

Based on the Stipulation of counsel, good cause appearing therefore, the Court finds that:

1. The government attorney will be out of the district for the current scheduled sentencing date and time.

2. The Defendant is in custody and does not object to the continuance.

3. The parties agree to the continuance.

4. Under Rule 32(b) of the Federal Rules of Criminal Procedure, the district court must impose sentence without unnecessary delay. The government's request to continue sentencing is necessary for the government to adequately prepare and be present at the defendant's sentencing hearing.

5. This is the third request for continuance filed herein.

IT IS HEREBY ORDERED that the Sentencing Hearing currently scheduled on Tuesday, March 7, 2023 at the hour of 1:30 p.m., be vacated and continued to March 22, 2023 at the hour of 1:30 p.m. in Courtroom 6C.

DATED this 22nd day of February, 2023.

  
Honorable Judge Andrew P. Gordon